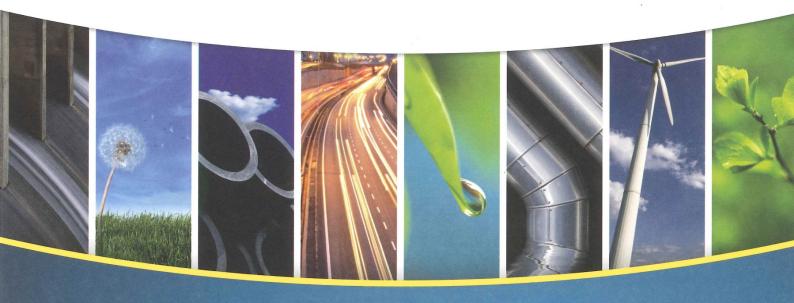
APPENDIX M

Waitarere Beach Road Curves Project Cultural Impact Assessment

Prepared for The New Zealand Transport Agency

December 2015





THE WAITARERE BEACH ROAD CURVES IMPROVEMENT PROJECT



Muaūpoko Tribal Authority Inc. AND NZ Transport Agency

CULTURAL IMPACTS ASSESSMENT

Prepared by Robert Warrington

Of Muaūpoko Tribal Authority Incorporated

Prepared for: **NZ Transport Agency**

Date: 14/12/2015



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1. Executive Summary

1.1 Introduction

Muaūpoko Tribal Authority Incorporated has been contracted by NZ Transport Agency to provide the Cultural Effects Assessment (CEA) for this Project. It is intended that the information shared by Muaūpoko Tribal Authority Incorporated and contained in the CEA will be used to inform the planning, design and mitigation of cultural impacts of the Project.

1.2 Purpose

The purpose of this report is to identify and assess the potential effects of the Project on the cultural values and associated overall well-being of Muaūpoko. This information will be used to inform decision making in relation to the location, design and management of the cultural impacts of the Project.

1.3 Objectives

- 1. Identify the relationships (through the cultural footprint model) that Muaūpoko has with the areas affected by the Project.
- 2. Identify and assess the effects (cultural, environmental, economic and social) that the Project may have on Muaūpoko and their values and well-being.
- 3. To inform NZ Transport Agency and its advisors of any particular culturally significant areas and Taonga that may be affected by the Project*.
- 4. Develop recommendations regarding what the NZ Transport Agency, in collaboration with Muaūpoko, will do in order to avoid, remedy or mitigate any adverse effects on the interests of Muaūpoko.
- 5. Develop an on-going process of engagement and collaboration with NZ Transport Agency.

(*It is at the discretion of Muaūpoko to determine the level of information that is disclosed around the location and nature of any why tuna, cultural areas and Taonga due to issues of sensitivity and security).

1.4 Assessment Methodology and Report Framework

In preparing this report I have:

- Visited the site for the proposed work with Daniel Parker and Kerehi Wi Warena.
- Checked for known registered archaeological sites on the New Zealand Archaeological Association "ArchSite" and reviewed the Archaeological report provided by Daniel Parker for NZ Transport Agency.
- Checked Maori land online to identify any known Maori Land to be effected,
- Checked Muaūpoko Historical Resources in regards to the area,
- Undertaken to expedite the report in the tight timeframe available, and
- NZ Transport have provided their Landscape and Visual Assessment Report dated November 2015 Appendix H, AND, Ecological Assessment Report also dated November 2015 – Appendix G, for perusal.



1.5 Project Description

The Waitarere Beach Road Curves Improvements Project (the Project) is approximately 7km north of Levin and is part of the 'North of Otaki to north of Levin' section of the Wellington Northern Corridor 'Roads of National Significance' (RoNS) programme. It is proposed to upgrade this section of State Highway 1 (SH1) by:

- Replacing the three existing curves with two curves of increased radii, in order to improve the road alignment.
- Widening the highway cross section to provide a median strip and wider shoulders.
- Providing wire rope barriers in the median and outer edge of the hard shoulder.
- Reconfiguring the intersections of SH1 with Waitarere Beach Road and Clay Road to improve the layout and visibility.
- Closing the Paeroa Road intersection with SH1, and connecting Paeroa Road by a parallel link road to a new intersection with SH1 further to the south at Hinaupiopio.
- Adding a right-turn bay opposite Poroutawhao School (note: these works are located roughly 500m beyond the northern end of the main improvement works).

While much of the Project area is relatively flat, more substantial earthworks will be required on the sand dune landforms that are located mainly between Paeroa and Waitarere Beach Roads. (Such earthworks are required to remove the existing 'S' curves in this area and replace them with a safer alignment). However, recent iterations to the design considerably reduced the need for earthworks on the dune landforms on the western side of the highway.

The Project will also include roadside swales and storm water retention ponds to improve storm water management. New culverts will be installed for the realigned sections or upgraded where the existing SH1 alignment is to be retained.

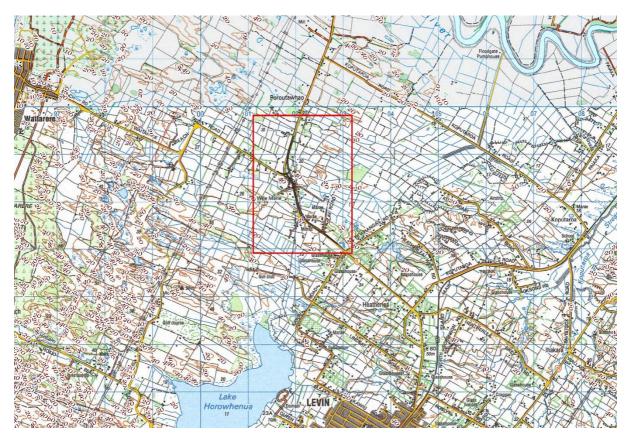




Figure 1 : Project location map. Source: Terraview with project design overlaid



2. Legislative Framework

2.1 Te Tiriti o Waitangi (The Treaty of Waitangi)

Te Tiriti o Waitangi (Te Tiriti) is the foundation constitutional document of Aotearoa (New Zealand). Muaūpoko signed Te Tiriti and are Treaty partners with the Crown.

- The principles of the Treaty of Waitangi are provided for under section 7 of the Heritage New Zealand Pouhere Taonga Act 2014, and
- The Resource Management Act 1991 (RMA) Part II section 8 Te Tiriti o Waitangi, states that "all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall take into account the principles of the Treaty of Waitangi".

2.2 Resource Management Act 1991

The consideration of Muaūpoko relationships with the Project area and the whenua has legal standing within various sections in Part II of RMA, namely sections 6(e), 7(a) and 8. Decision makers exercising powers and functions under the RMA shall;

- s6(e): As a 'matter of national importance', recognise and provide for the relationship of Māori and their culture and traditions with their ancestral lands, water, areas, why tapu, and other Taonga
- s7(a): Have particular regard for kaitiakitanga
- s8: Take into account the principles of the Treaty of Waitangi

Applicants for consents or permits under the RMA are required to identify all effects of an activity and then demonstrate, where adverse effects are identified, that they can satisfactorily *avoid*, *remedy* or *mitigate* such effects to an acceptable level. The framework of the four 'well-beings' (cultural, environmental, social and economic) that are set out in the RMA² will be used to frame the discussion on the effects on Muaūpoko.

Note: Muaūpoko Tribal Authority Incorporated is the mandated representative for Muaūpoko as an "iwi authority" for the purposes of the Resource Management Act 1991¹. Muaūpoko Tribal Authority Incorporated has relationships with the Horowhenua District Council and the Horizons Regional Council

2.3 Protected Objects Act 1975

On 1 November 2006, the Protected Objects Act³ came into force and superseded the Antiquities Act 1975. Cultural items derived from an archaeological site consisting of any object, assemblages, scientific samples and organic remains (especially Taonga tūturu) are regulated and controlled by the Ministry for Culture and Heritage pursuant to the Protected Objects Act 1975. The term Taonga tūturu includes all finished items made by Maori and those items used by Maori. The Ministry for Culture and Heritage (MCH) has developed

.

¹ New Zealand's Ministry for Culture and Heritage created a well-being model that includes cultural, environmental, social, and economic dimensions (New Zealand Ministry for Culture and Heritage (2006). Cultural well-being and local government. Report 1: Definition and context of cultural well-being. Wellington, NZ: New Zealand Ministry for Culture and Heritage. p1).

² Part 2, s5 of RMA 1991- refers to social, economic, and cultural well-being and sustaining and protecting the environment.

³ (Protected Objects Act 1975)



guidelines for Taonga tūturu⁴ which explains this process in more detail. The Ministry should be contacted if a Taonga tūturu is found.

Note: Muaūpoko Tribal Authority Incorporated has a relationship with MCH, we are an approved collector of taonga tūturu, is also a Kaitiaki of taonga tūturu in its care and has been through the taonga tūturu claims process before. Please see the Muaūpoko Accidental Discovery Protocol for our minimum expectations for the discovery of taonga tūturu.

2.4 Heritage New Zealand - Pouhere Taonga Act 2014

Heritage New Zealand is responsible for administering the *Heritage New Zealand Pouhere Taonga Act* 2014⁵ which replaced the Historic Places Act 1993 on 20 May 2014. The purpose of this Act is to identify, preserve, protect and conserve the cultural heritage of New Zealand.

Note: Muaūpoko Tribal Authority Incorporated has relationships with this stakeholder. Please see the Muaūpoko Accidental Discovery Protocol for our minimum expectations for the discovery of wāhi tapu and wāhi tupuna.

2.5 Kōiwi Tupuna

The five main pieces of legislation that have particular relevance to the way in which kōiwi Tupuna / human remains are dealt with in New Zealand include:

- Coroners Act 2006
- Burial and Cremation Act 1964
- Heritage New Zealand Pouhere Taonga Act 2014
- Protected Objects Act 1975
- Te Ture Whenua Maori Act 1993

More than one Act may apply in discovery of kōiwi Tupuna, depending on the circumstances. There are four key stakeholders who are contacted when a Kōiwi Tupuna is found.

- New Zealand Police
- Heritage New Zealand
- Ministry of Health
- lw

Note: **Muaūpoko Tribal Authority Incorporated** has relationships with each of these stakeholders. Please see the **Muaūpoko Accidental Discovery Protocol** for our minimum expectations for the discovery of Kōiwi Tupuna.

⁴ (MCH guide for Taonga Tūturu, 2014)

⁵ (New Zealand Heritage Pouhere Taonga Act 2014;)



3. Cultural Effects Assessment Model

3.1 Cultural Effects Assessment Process

A Cultural Effects Assessment (CEA) is a tool that can be used to identify the potential effects that a proposed activity may have on a cultural group. As such this 'Muaūpoko Cultural Effects Assessment' is an environmental management tool. It identifies the past, present, and future relationships, values and aspirations held by Muaūpoko. These values and aspirations should be recognised, protected and managed in decision-making relating to the Project. All effects in this CEA Report are 'cultural' as they affect the well-being of Muaūpoko as a cultural group.

A successful Cultural Effects Assessment will allow Muaūpoko to:

- 1. UNDERSTAND and INFORM the proposed activity, by PARTICIPATING in planning and decision making at an early stage and throughout the project. This includes INFORMING and REVIEWING the draft application and/or all supporting information (such as technical reports, engineering assessments, archaeological records, etc.) and through workshops with the applicant and their advisors/consultants.
- 2. IDENTIFY the relationships of Muaūpoko with the whenua and ASSESS whether the statutory 'cultural' safeguards of the RMA (s 6(e), 7(a), 8) have been met.
- 3. IDENTIFY the effects of the proposed activity on Muaūpoko and their values and determine the significance of the effects, assessed individually or collectively.
- 4. Where significant adverse effects on Muaūpoko or their values are identified, ASSESS whether these can be avoided, remedied or mitigated.
- 5. MAKE RECOMMENDATIONS to the applicant on measures that Muaūpoko would like the applicant to take to recognise and protect the cultural values of Muaūpoko. This includes avoiding, remedying and mitigating adverse effects.

MEASURES to address any cultural issues will generally fall into the following categories:

- matters that can be addressed as conditions of designation, resource consent applications and other statutory authorisations.
- matters that cannot be addressed as resource consent conditions, but as agreements between the applicant and Muaūpoko.
- matters that are relationship based and are better addressed via a 'Memorandum of Understanding' or other such agreement.
- matters that cannot be resolved at this point but will be revisited as appropriate.

3.2 Muaūpoko Taiao Cultural Values

Muaūpoko has identified key principles which have been used to assess the impact or effects of proposed activities on our cultural values. These include:

3.2.1 Mauri

Mauri is the life force that comes from wairua - the spirit, or source of existence and all life. Mauri is the life force in the physical world. The overall purpose of resource management for Muaūpoko is the maintenance of the mauri of natural and physical resources, and to enhance mauri where it has been degraded by the actions of humans.

As a life principle mauri implies health and spirit. In the environment, mauri underlies all resources and the total ecosystem. In the community, mauri is of paramount importance to



the wellbeing of the people. Mauri can be harmed by the actions of humans but is unaffected by natural processes such as natural disasters.

The preservation of the mauri of natural resources is paramount to Muaūpoko to ensure that resources may be used sustainably by present and future generations. Traditionally, rules were established to govern the use of natural and physical resources, and ensure that the mauri was protected from human actions. These rules form part of kawa and tikanga (Māori protocol) and have been passed on through the generations. For example, a rāhui may be used to safeguard the mauri of a particular resource, by enforcing a temporary restriction on use of the resource to protect the overall health and availability of the resource for both present and future generations. The RMA seeks these same outcomes; to promote the sustainable management of natural and physical resources (Section 5(1)).

There are indicators within the environment that Muaūpoko use to interpret the status of mauri. These include (but are not limited to) the presence of healthy kai and other indigenous flora and fauna, the presence of resources fit for cultural use, and the aesthetic qualities of resources such as the visibility of important landmarks. Other indicators can take many forms and are recalled in the kōrero pūrākau (stories) of whānau (extended family) and hapu (subtribe).

3.2.2 Tikanga

Cultural practices, or tikanga, were developed to maintain the mauri of the domains of Atua. They are based on the general understanding that people belong to the land and have a responsibility as kaitiaki of that land. Tikanga incorporates concepts such as tapu (sacredness) and rāhui (temporary restriction). These are forms of social control, which manage the interrelationship of people and the environment. Observing tikanga is part of the ethic and exercise of kaitiakitanga.

3.2.3 Kaitiakitanga

All persons exercising powers and functions under the RMA, in relation to managing the use, development, and protection of natural and physical resources, shall have particular regard to kaitiakitanga (Section 7). However, kaitiakitanga is not explained adequately in the RMA. Muaūpokohave our own explanations and understandings of Kaitiakitanga which are applied and articulated in this assessment.

3.3 Tāngata Whenua Pūtake Framework

The Tāngata Whenua Pūtake Framework as outlined below has been developed as a tool for this cultural effects assessment process. It expresses our connections to our ancestors (Tāngata), highlights iconic identity markers which provide reference points in our environment (Whenua) and then notes specific associations through historical events and activities (Pūtake).

3.3.1 Tāngata - People and Ancestors

Describes our whakapapa (genealogical connections) and tuna (ancestors), the people that connect us to this place. At any given time there were tuna of significance who had strong associations and connections to the whenua and surrounding areas. This also provides profile of the current generation of lwi members who may be effected socially and economically by this project.



3.3.2 Whenua – Heritage Area

A heritage area is used to describe the customary / traditional rohe (area) where an lwi has associations through occupation and activities over time. As a result there will be why tapu (archaeological sites), why tupuna (ancestral places), tupuna kōiwi (ancestral remains), Taonga tūturu (Maori made artefacts), why mahinga (resource areas such as food and fisheries), korero tuku iho (stories) associated to the lwi which effect the lwi.

It is recognised that Heritage areas may overlap with other lwi. The use of "mana whenua" or "take whenua" to describe customary authority by an lwi over a rohe is often being used to imply an exclusive or priority right over other lwi interests. However, lwi may have layers of interest based on their time of use, occupation and association to the area.

In colonial times the government made numerous land deals with lwi which often did not reflect the layers of interests groups had to areas, but established exclusive land holdings for specific groups. The competition between groups for land may have resulted in exclusive ownership by one group of the land, but not other groups association, and sometimes continued use of the land.

The assessment will describe our rohe (area of interest) through our association with cultural identity markers and associations to the project area.

3.3.3 Pūtake – Activities, events, rights and aspirations

Describes events and activities which provide connections and rights to occupy or access areas and their associated resources. These may have been hereditary or conquest rights, e.g. tuku, raupatu, pakanga. They may have been related to sustaining the people such as rāhui and mahinga kai, or preserving an area eg. tapu – kaupapa. This also describes the current generations aspirations in relation to the project area and broader district.

4. Effects on Tängata Whenua Pütake

4.1 Tāngata Whenua Pūtake

Muaūpoko originate from Te Upoko o te Ika a Maui⁶ (the head of the fish of Maui) area, which is also one of the korero tuku iho for the origin of our iwi name Muaūpoko. Traditionally, Muaūpoko occupied an area stretching from Sinclair Head in the south to the Rangitīkei River in the north. This territory was bounded by the Tararua Ranges in the east and Te Moananui a Maui (Tasman Sea) in the west⁷.

Our tuna (ancestors) named many geographical features in our heritage area

Pūtake	Korero
Kupe	Kupe explored both the North and South Islands and his wife Kuramārōtini is
	credited with giving the name Aotearoa when she sighted the North Island.
	Numerous places were named in association to Kupe including Te Mana a Kupe ki
	te moanani-a-akiwa (Mana Island). A Whare Runanga built him at Panui-a-marama
	in Horowhenua in the 1870s was named after Kupe. Te Rangihiwinui Keepa
	identified Kupe as the tupuna from whom Muaūpoko derived their rights from in a

⁶ AJHR 1898 G2A, Horowhenua Block, p 111, evidence of Rawinia Ihaia

⁷ Darren Reid. 'Muaūpoko - Early history', Te Ara - the Encyclopaedia of New Zealand, updated 15-Nov-12 URL: http://www.TeAra.govt.nz/en/map/1307/muaupoko-tribal-area



Pūtake	Korero
	land claim from the Manawatu River to the Wainui Block in the Native Court in 1872.
Whātonga	Whātonga was a rangatira of the Kurahaupō waka and he explored the lower North Island. A Muaūpoko and Kurahaupō lwi tradition states Whātonga named the Tararua after his two wives, Hotuwaipara and Reretua. Muaūpoko descend from both his sons Tara (the eponymous ancestor for the Ngai Tara lwi) and Tautoki (the father of Rangitāne, who is the eponymous ancestor for Rangitāne lwi).
Te Haunui-a- nanaia	Te Haunui-a-nanaia is a descendant of Kupe and a son of Pōpoto, one of the rangatira of the Kurahaupō waka. He is a significant tupuna for Te Āti Haunui-a-paparangi, Muaūpoko and other Kurahaupō lwi. He named many geographical features including the Manawatū River, Te Rerenga o Hau area, Hokio Stream, Ohau River, Otaki River, Waimeha Stream, Waikanae River, Te Ana a Hau Rock, OWairaka, Remutaka Hill, Wai o Hine Wairaka Stream, , Waiawangawanga Stream, Waipoua Stream and Ruamahanga River
Tara	Tara, also known as Tara-ika and Tara-nohu, is the eponymous ancestor of the Ngai Tara lwi. He is a significant Tupuna of Muaūpoko and numerous geographical features and places are named after him such as Te Whanganui-a-Tara (Wellington), Te Waewae Kapiti o Tara raua ko Tautoki, [(which is sometimes supplemented with Rangitāne] known today as Kapiti Island.
Tūteremoana	Tüteremoana is a descendants of Kupe, Whātonga and Pōpoto. He was the leading rangatira of Ngai Tara in his day and there are numerous places named after him such as the highest peak on Kapiti Island.

Note: The maintenance of traditional Maori names or the creation of new names is an important part of maintaining lwi associations to an area. **Muaūpoko Tribal Authority Incorporated** should be consulted when considering naming places, buildings, bridges,

Muaūpoko has shared whakapapa (genealogy / ancestry) and history, including alliances, occupation and even conflicts with Ngai Tara, Ngāti Ira, Rangitāne, Ngāti Apa and Ngāti Kahungunu. Muaūpoko developed our own identity, mana motuhake (independence) and pūtake (rights) to distinguish ourselves from our neighbours. Muaūpoko communities also lived in Tōtaranui (Queen Charlotte Sound) and Te Taitapu (Northern West Coast) in Te Waipounamu (the South Island). In the 1820s-1830s saw the migration and conflict between many lwi throughout Aotearoa. As a result Ngāti Raukawa from Maungatautari, Te Ātiawa from Taranaki and Ngāti Toarangatira from Kawhia migrated and settled in the area.

In 1840 Taueke of Muaūpoko signed the Treaty of Waitangi. Muaūpoko made land claims and entered into transactions with the crown, which have led to grievances because Muaūpoko interests were not investigated or protected.

Examples of Muaūpoko Land Claims and Crown Transaction in the area

1856 Te Waipounamu Deeds: Claim of Noa Te Whata for Muaūpoko Interests in Te Waipounamu was paid 1 pound, but he did not receive any land.

1858 Wainui Block Purchase: Muaūpoko were signatories but did not receive payment or land.

1859 Awahou Block Purchase: Muaūpoko were not signatories, although some were given money by the other lwi.

1866 Rangitikei to Manawatū Block 1866 Purchase: Muaūpoko were signatories and received some payment, but no land. Legislation prevented Muaūpoko signatories from going to the Native Land Court to seek further redress.

1872 Te Awa Hou Native Reserve purchase. Muaūpoko were signatories with other lwi and received money, however no land was reserved for signatories.

1872 Aorangi (also known as Taonui / Oroua Block) : Muaūpoko and other lwi made claims to this block and received some payment.

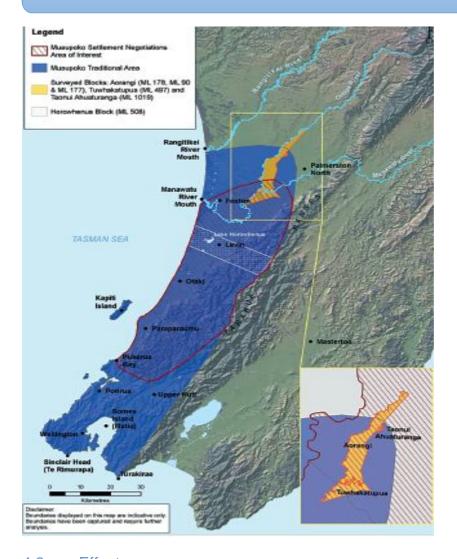
1873 Horowhenua Block: Awarded through the Native Land as a result of competing claims between lwi.



1873 Tararua Block: Muaūpoko and other iwi made claims to the Tararua Range in 1866 and 1872. They Signed a Deed in 1873 which promised to reserve 2,000 ha for the three iwi. Although they received payment, the reserve were never received.

1883 Taitapu Block: Muaūpoko identified interests in this Block in 1852 to the Crown who tried to purchase it. However, it was not until 1883 before the Block went through the native land court and awarded to other iwi.

Note: **The Project** is in the **Muaūpoko heritage area** (see map below) and will impact on **Muaūpoko**, see section 4.2 Effects on Tāngata Whenua Pūtake



4.2 Effects

The very nature of the work being carried out is invasive to Papatuanuku. The Waitarere area was known for its extensive waterways, such as Waimakaira Swamp which once provided a vast fresh water fishery, along with other swamps, such as Kopua Pangopango Swamp, Kaihuka, etc. These were connected by man-made (Muaūpoko) water races to form one large integrated fish habitat.

Water flows from the sacred lakes within the Tararua ranges towards the sea, and these swamps (Or Kidneys), were kept pristine clean by the vegetation and waterways (swamps) now mostly cleared for farming.



As far as possible, Muaūpoko aspire to correct the invasive nature of the works through extensive native plantings, and removal of fish barriers. The Native plantings not necessarily limited to the specific road boundaries.

The coastal dune area to the West, to the Waitarere Beach is of vital importance to Muaupoko fishery, where shellfish should be abundant, and should be protected from fine metals and other particles that accumulate on roads and are invariably washed to the sea by natural action.

Apart from the extensive wetlands, the majority of the surrounding area was made up of dune ridges, and these are used for occupation, hunting, and gathering, etc.

Traditional Muaūpoko burials were initially sand dune based, and sometime later koiwi removed for cleaning and relocated at a place of the whanau choosing. Some relocated to the Tararua ranges, and some a little closer.

Given the proximity of other burial sites, accidental discovery of koiwi or artefacts should not be ruled out.

4.3 Recommendations

- 1. **Muaūpoko** may participate at different stages of the Project including planning, construction and operations/maintenance for the lifespan of the project. This includes the implementation of consent conditions and the preparation and implementation of the associated management plans.
- 2. Plans should include **Muaūpoko- lwi Accidental Discovery Protocol**, which should be followed if discoveries are made, see Appendix 1. This should include a briefing of contractors before work commences.
- 3. In relation to signage:
- All signage with Māori names will have macrons as required.
- All signage to be bilingual where possible.
- No new names or translations to be given without engaging with Muaupoko Tribe.
- **4.** The contractors engaged by **NZ Transport Agency** will be encouraged to work with local lwi and business to share the economic opportunities within the local communities affected by the Project, especially during construction.



5. Supporting Information

5.1 Appendix 1: Iwi Accidental Discovery Protocol

Cultural or archaeological finds

- 1. The Requiring Authority, in consultation with, Ngāti Huia, Ngāti Matau, the Muaūpoko Tribal Authority and Heritage New Zealand shall prepare a schedule of "On Call Procedures" to be implemented in the event of the discovery of cultural or archaeological artefacts or features during the construction of the Project in any area not covered by archaeological authorities obtained under Part 3 of the Heritage New Zealand Pouhere Taonga Act 2014. This schedule shall be submitted to the [Manager] at least 15 working days prior to any construction commencing. The "On Call Procedures" shall include, but need not be limited to:
 - a) Training procedures for all contractors regarding the possible presence of cultural or archaeological sites or material, what these sites or material may look like, and the relevant provisions of the Heritage New Zealand Pouhere Taonga Act 2014 if any sites or material are discovered;
 - b) Parties to be notified in the event of an accidental discovery shall include, but need not be limited to Ngāti Huia, Ngāti Huia ki Matau, the Muaūpoko Tribal Authority, Heritage New Zealand, Horizons Regional Council, Horowhenua District Council and, if koiwi are discovered, the New Zealand Police;
 - c) Procedures to be undertaken in the event of a discovery (these shall include immediate ceasing of all physical works in the vicinity of the discovery); and
 - d) Procedures to be undertaken before work under this designation may recommence in the vicinity of the discovery. These shall include allowance for appropriate tikanga (protocols), recording of sites and material, recovery of any artefacts, and consulting with to Ngāti Huia, Ngāti Huia ki Matau, the Muaūpoko Tribal Authority and Heritage New Zealand prior to recommencing works in the vicinity of the discovery.

Advice Note: The Requiring Authority is responsible for obtaining archaeological authorities from Heritage New Zealand under section 44 of the Heritage New Zealand Pouhere Taonga Act 2014, prior to the commencement of construction. The authorities are likely to include requirements for management of detailed investigations and monitoring. Condition [1] is complementary to requirements under the archaeological authorities.